

The Honorable Tana Lin

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MATTHEW STODOLA and LYNDSEY  
STODOLA, on behalf of their minor child,  
V.S.,

Plaintiffs,

v.

CITY OF BELLINGHAM and UNITED  
STATES OF AMERICA,

Defendants.

Case No. 2:24-cv-00004-TL

STIPULATED MOTION AND  
[~~PROPOSED~~] ORDER FOR STAY

Noted for Consideration:  
December 19, 2024

**JOINT STIPULATION**

The parties stipulate and agree to a brief stay or extension of all dates in order to facilitate efforts to resolve this case for any time after June 20, 2025.

All parties have reached an agreement to settle this matter. Because one of the plaintiffs is a minor, Plaintiffs are in the process of seeking appointment of a settlement guardian ad litem through Washington State court and then the state court's approval of the settlement. Assuming approval is granted, the parties intend to file a notice of voluntary dismissal pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

1 Plaintiffs' counsel has informed that parties that the SGAL appointment and court  
2 approval process could take between three to six months. In light of that, the parties request  
3 that the case be stayed for six months so Plaintiffs may finalize the state court approval process.  
4 As all issues have been resolved and the parties intend to dismiss with prejudice and without  
5 costs or fees to any party, there are no claims or defenses left to litigate. There is good cause for  
6 a stay, which will preserve the Court's and the parties' resources. *See King v. State of*  
7 *California*, 784 F.2d 910, 912 (9th Cir. 1986). Thus the parties stipulate to this motion and  
8 respectfully request that the Court strike all deadlines and stay the matter until June 20, 2025.

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10 DATED this 19th day of December, 2024.

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Respectfully submitted,

TESSA M. GORMAN  
United States Attorney

BRETT MCCANDLIS BROWN &  
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s/ Nickolas Bohl

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*Attorneys for United States of America*

*I certify that this memorandum contains 228  
words, in compliance with the Local Civil  
Rules.*

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*Attorney for City of Bellingham*

**[PROPOSED] ORDER**

It is so **ORDERED**.

DATED this 19th day of December, 2024.



Tana Lin  
United States District Judge